

**IN THE UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION**

Nelson L. Bruce,)	Civil Action No. 2:21-cv-00895-BHH-MGB
)	
Plaintiff,)	
)	
v.)	
)	
T-Mobile USA, Inc. et. al,)	<u>DEFENDANT’S RESPONSES TO LOCAL</u>
)	<u>RULE 26.01 INTERROGATORIES</u>
Defendant.)	
)	
)	
)	

Defendant T-Mobile USA, Inc., pursuant to Local Rule 26.01, hereby files its responses to Local Rule 26.01 Interrogatories.

(A) State the full name, address, and telephone number of all persons or legal entities who may have a subrogation interest in each claim and state the basis and extent of that interest.

RESPONSE: There are no such persons or entities.

(B) As to each claim, state whether it should be tried jury or nonjury and why.

RESPONSE: Plaintiff has the right to request a jury trial of his claims arising under the common law of South Carolina. Any requests for equitable remedies should be decided by the Court.

(C) State whether the party submitting these responses is a publicly-owned company and separately identify: (1) any parent corporation and any publicly-held corporation owning ten percent (10%) or more of the party’s stock; (2) each publicly-owned company of which it is a parent; and (3) each publicly-owned company in which the party owns ten percent (10%) or more of the outstanding shares.

RESPONSE: T-Mobile USA, Inc. is a not a publicly owned company. T-Mobile USA, Inc. is wholly owned by T-Mobile US, Inc., which is a publicly owned company.

- (D) State the basis for asserting the claim in the division in which it was filed (or the basis of any challenge to the appropriateness of the division).

RESPONSE: Plaintiff asserted this claim in the division in which it was filed and Defendant does not challenge the appropriateness of the division.

- (E) Is this action related in whole or in part to any other matter filed in this District, whether civil or criminal? If so, provide: (1) a short caption and the full case number of the related action; (2) an explanation of how the matters are related; and (3) a statement of the status of the related action.

RESPONSE: T-Mobile USA, Inc. is unaware of any related matters filed in this District.

- (F) If the Defendant is improperly identified, give the proper identification and state whether counsel will accept service of an amended summons and pleading reflecting the correct identification.

RESPONSE: T-Mobile USA, Inc. is properly identified.

- (G) If you contend that some other person or legal entity is, in whole or in part, liable to you or the party asserting a claim against you in this matter, identify such person or entity and describe the basis of their liability.

RESPONSE: At this time, T-Mobile USA, Inc. does not contend that some other entity is liable to them or to Plaintiff.

Respectfully submitted,

s/ M. Claire Flowers
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ATTORNEYS FOR DEFENDANT

August 5, 2021

Charleston, South Carolina

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Nelson L. Bruce,)	Civil Action No. 2:21-cv-00895-BHH-MGB
)	
Plaintiff,)	
)	
v.)	
)	<u>CERTIFICATE OF SERVICE</u>
T-Mobile USA, Inc.,)	
)	
Defendant.)	
)	
_____)	

I hereby certify that a copy of **DEFENDANT'S RESPONSES TO LOCAL RULE 26.01 INTERROGATORIES** has been served upon Plaintiff by mailing a copy of the same to him, postage prepaid, in the United States Mail, to the address as shown below on the 5th day of August 2021:

**Nelson L. Bruce
144 Pavilion Street
Summerville, SC 29483**

s/ M. Claire Flowers

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